

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

December 4, 2003

RECEIVED

2003 DEC -4 PM 3:19

T.R.A. DOCKET ROOM

IN RE: Implementation of the Federal) Docket No: 03-00491
Communications Commission's Triennial)
Review Order (Nine-month Proceeding))
(Switching))

**IDS TELCOM, LLC'S ANSWERS TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES**

IDS Telcom, LLC ("IDS"), hereby serves its Answers to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories.

IDS files these Answers to comply with the requirements set forth in the *Procedural Schedule*. Should additional Answers be discovered as IDS prepares its responses to any discovery, IDS reserves the right to supplement these Answers.

Further, at the time of the filing of these objections, the issues to be addressed in this proceeding have not yet been identified. Should additional Answers develop as the Commission identifies the issues to be addressed in this proceeding, IDS reserves the right to supplement these Answers.

ANSWERS

INTERROGATORY NO. 1: Identify each switch owned by IDS that IDS uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

RESPONSE: Respondent does not currently own a switch that provides qualifying service in Tennessee. As such, Interrogatories 1 through 10 are not applicable to Respondent.

INTERROGATORY NO. 2: For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;

- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE: Not Applicable.

INTERROGATORY NO. 3: Identify any other switch not previously identified in Interrogatory No. 1 that IDS uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by IDS either on an unbundled or resale basis.

RESPONSE: Not Applicable.

INTERROGATORY NO. 4: For each switch identified in response to Interrogatory No. 3, please:

- (a) identify the person that owns the switch;
- (b) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (c) provide the street address, including the city and state in which the switch is located;
- (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
- (f) identify all documents referring or relating to the rates, terms, and conditions of IDS' use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG

RESPONSE: Not Applicable.

INTERROGATORY NO. 5: Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in

response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE: Not Applicable.

INTERROGATORY NO. 6: For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

RESPONSE: Not Applicable.

INTERROGATORY NO. 7: With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

(m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

RESPONSE: Not Applicable.

INTERROGATORY NO. 8: Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

RESPONSE: Not Applicable.

INTERROGATORY NO. 9: For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

RESPONSE: Not Applicable.

INTERROGATORY NO. 10: With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

RESPONSE: Not Applicable.

INTERROGATORY NO. 11: Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 12: For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 13: With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 14: Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and conditions of IDS' provision of switching capability.

RESPONSE: No.

INTERROGATORY NO. 15: Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 16: Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 17: If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the

financial viability of self-provisioning switching in your providing qualifying services to end user customers.

RESPONSE: IDS is not in possession or control of any documents responsive to this interrogatory. In the event that IDS comes into possession of any such information, IDS will supplement these answers accordingly.

INTERROGATORY NO. 18: Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Tennessee? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Tennessee.

RESPONSE: No.

INTERROGATORY NO. 19: Identify each MSA in Tennessee where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Respondent is either providing qualifying services in each Tennessee MSA or plans to provide services in each Tennessee MSA to the extent possible.

INTERROGATORY NO. 20: If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Respondent either provides or plans to provide qualifying services in all geographic areas that the ILEC, BellSouth provides qualifying services pursuant to the Interconnection Agreement signed by the Parties.

INTERROGATORY NO. 21: Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE: Respondent provides the same types of qualifying services as those provided by the ILEC, BellSouth either in a UNE-P basis or via Resale as fully set forth in the Interconnection Agreement filed with the Commission. Respondent provides these qualifying services to residential and business customers. Respondent typically provides these services at discount of between 20% and 50% off of the ILEC retail rates as published in their relevant tariffs. This information more specifically contained within IDS' tariff filed with the Commission.

INTERROGATORY NO. 22: Identify each MSA in Tennessee where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Respondent offers non-qualifying (Long Distance) services throughout the State of Tennessee without regard for a particular MSA.

INTERROGATORY NO. 23: If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Respondent offers non-qualifying (Long Distance) services throughout the State of Tennessee without regard for a particular MSA.

INTERROGATORY NO. 24: Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to

identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE: Long Distance services are provided through the state of Tennessee and the rates terms and conditions contained in Respondents Tariff as filed with the Commission.

INTERROGATORY NO. 25: Please state the total number of end users customers in the State of Tennessee to whom you only provide qualifying service.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 26: For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 27: For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 28: Please state the total number of end users customers in the State of Tennessee to whom you only provide non-qualifying service.

RESPONSE: These figures cannot be readily ascertained at this time. IDS does not maintain a running calculating of information relevant to this request at this time.

INTERROGATORY NO. 29: For those end user customers to whom you only provide non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: These figures cannot be readily ascertained at this time. IDS does not maintain a running calculating of information relevant to this request at this time.

INTERROGATORY NO. 30: Please state the total number of end users customers in the State of Tennessee to whom you provide both qualifying and non-qualifying service.

RESPONSE: These figures cannot be readily ascertained at this time. IDS does not maintain a running calculating of information relevant to this request at this time.

INTERROGATORY NO. 31: For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: These figures cannot be readily ascertained at this time. IDS does not maintain a running calculating of information relevant to this request at this time.

INTERROGATORY NO. 32: For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

RESPONSE: These figures cannot be readily ascertained at this time. IDS does not maintain a running calculating of information relevant to this request at this time.

INTERROGATORY NO. 33: Please provide a breakdown of the total number of end user customers served by IDS in Tennessee by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 34: For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 35: For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003.

INTERROGATORY NO. 36: For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

RESPONSE: Respondent cannot readily ascertain the requested information.

INTERROGATORY NO. 37: Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Tennessee.

RESPONSE: Respondent does not have documents in its possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections regarding the cumulative market share growth in the local exchange market in Tennessee.

INTERROGATORY NO. 38: Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Tennessee.

RESPONSE: Respondent is not in possession, custody or control of any documents that evaluate, discuss or otherwise refer or relate to the cumulative market share growth in the local exchange market in Tennessee.

INTERROGATORY NO. 39: Describe how the marketing organization that is responsible for marketing qualifying service in Tennessee is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

RESPONSE: Please see Respondents Objection to this Interrogatory filed November 6, 2003. However, Respondent does not currently employ a marketing organization in the State of Tennessee.

INTERROGATORY NO. 40: How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

RESPONSE: Respondent currently only provides services to customer for which it can duplicate services on UNE-P or Resale. If a customer requires services other than those that Respondent is able to provide using UNE-P and/or resale, it will not provide said services at this time.

INTERROGATORY NO. 41: Is there a typical or average number of DSOs at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

RESPONSE: No.

INTERROGATORY NO. 42: What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

RESPONSE: Not applicable. See response to No. 40 above.

INTERROGATORY NO. 43: What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

RESPONSE: Respondent has no information responsive to this interrogatory.

INTERROGATORY NO. 44: With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

RESPONSE: Respondent has no information responsive to this interrogatory.

INTERROGATORY NO. 45: In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

RESPONSE: Respondent has no information responsive to this interrogatory.

INTERROGATORY NO. 46: Provide your definition of sales expense as that term is used in your business.

RESPONSE: Respondent defines sales expense as commissions and bonuses for sales force and direct or telemarketing sales agents plus salaries, benefits and incidental expenses such as mileage and cell phones expenses as well as advertising expenses.

INTERROGATORY NO. 47: Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE: Respondent estimates sales expense as those expenses not related to network operations, provisioning and maintenance expenses.

INTERROGATORY NO. 48: Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

RESPONSE: General and Administrative expenses are network operations, provisioning costs, maintenance expenses, billing expenses and other back office expense which are too numerous to list but that are included in the General Accounting Standards for telecommunications providers as set forth by each state utility commission.

INTERROGATORY NO. 49: Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE: Respondent does not have information relevant to this interrogatory.

INTERROGATORY NO. 50: For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for IDS in each state in BellSouth's region.

RESPONSE: Unknown

INTERROGATORY NO. 51: For each individual hot cut identified in response to Interrogatory No. 50, state:

- (a) Whether the hot cut was coordinated or not;
- (b) If coordinated, whether the hot cut occurred as scheduled;
- (c) If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, IDS, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- (d) If there was a problem with the hot cut, state whether IDS complained in writing to BellSouth or anyone else.

RESPONSE: Unknown

INTERROGATORY NO. 52: Does IDS have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE: Not at this time.

INTERROGATORY NO. 53: Does IDS have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE: Not at this time.

INTERROGATORY NO. 54: State whether IDS agrees that it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 16, 2001 Memorandum of Understanding. If IDS does not agree, explain why and explain IDS' view of its involvement in the development of that process.

RESPONSE: Respondent has no way of independently verifying this information. The individuals who would have worked on this process are no longer employed by Respondent. Therefore Respondent is unable to provide specific information for this interrogatory.

INTERROGATORY NO. 55: If IDS has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in IDS' process that differs from BellSouth's process.

RESPONSE: Respondent does not currently have a preferred for individual hot cuts.

INTERROGATORY NO. 56: If IDS has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in IDS' process that differs from BellSouth's process.

RESPONSE: Respondent does not currently have a preferred for bulk hot cuts.

INTERROGATORY NO. 57: Does IDS have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE: No.

INTERROGATORY NO. 58: Does IDS have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE: No.

INTERROGATORY NO. 59: What is the largest number of individual hot cuts that IDS has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

RESPONSE: Unknown.

INTERROGATORY NO. 60: Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to IDS or that IDS believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE: Unknown.

INTERROGATORY NO. 61: Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to IDS? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: Unknown.

INTERROGATORY NO. 62: Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to IDS or that IDS believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE: Respondent is unaware of other ILECs individual hot cut processes by which to compare..

INTERROGATORY NO. 63: Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to IDS? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: Respondent is unaware of other ILEC's rates for individual hot cuts by which to compare.

INTERROGATORY NO. 64: Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to IDS or that IDS believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE: Respondent is unaware of other ILEC's batch hot cut processes by which to compare.

INTERROGATORY NO. 65: Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to IDS? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: Respondent is unaware of other ILEC's batch hot cut processes by which to compare.

INTERROGATORY NO. 66: Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to IDS or that IDS believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE: Respondent is unaware of individual hot cut processes of ILEC's outside the BellSouth region.

INTERROGATORY NO. 67: Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to IDS? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: Unknown.

INTERROGATORY NO. 68: Does IDS order coordinated or non-coordinated hot cuts?

RESPONSE: Respondent does not order hot cuts in Tennessee.

INTERROGATORY NO. 69: Does IDS use the CFA database?

RESPONSE: No. Respondent does not order hot cuts in Tennessee.

INTERROGATORY NO. 70: Identify every issue related to BellSouth's hot cut process raised by IDS at the Tennessee CLEC collaborative since October 2001.

RESPONSE: Respondent does not and has not required any hot cuts in Tennessee. As such, Respondent did not participate in the Tennessee CLEC collaborative.

INTERROGATORY NO. 71: What is the appropriate volume of loops that you contend the Tennessee Regulatory Authority ("TRA") should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Respondent does not require nor does it anticipate requiring hot cuts in Tennessee in the foreseeable future. As such it is unable to ascertain such a volume at this time.

INTERROGATORY NO. 72: What is the appropriate process that you contend the TRA should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Respondent does not require nor does it anticipate requiring hot cuts in Tennessee in the foreseeable future. As such it is unable to provide information relative to this interrogatory.

INTERROGATORY NO. 73: If IDS disagrees with BellSouth's individual hot cut process, identify every step that IDS contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE: Respondent does not agree or disagree with the current process. It simply has not experience in Tennessee with this type of issue.

INTERROGATORY NO. 74: If IDS disagrees with BellSouth's bulk hot cut process, identify every step that IDS contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE: Respondent does not agree or disagree with the current process. It simply has not experience in Tennessee with this type of issue.

INTERROGATORY NO. 75: Identify by date, author and recipient every written complaint IDS has made to BellSouth regarding BellSouth's hot cut process since October 2001.

RESPONSE: Unknown.

INTERROGATORY NO. 76: How many unbundled loops does IDS contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

RESPONSE: Unknown.

INTERROGATORY NO. 77: What is the appropriate information that you contend the TRA should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Respondent does not have experience with said processes in Tennessee in order to make a determination one way or another.

INTERROGATORY NO. 78: What is the average completion interval metric for provision of high volumes of loops that you contend the TRA should require in establishing a

batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Unknown.

INTERROGATORY NO. 79: What are the rates that you contend the TRA should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Unknown.

INTERROGATORY NO. 80: What are the appropriate product market(s) that you contend the TRA should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Unknown.

INTERROGATORY NO. 81: What are the appropriate geographic market(s) that you contend the TRA should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Unknown.

INTERROGATORY NO. 82: Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

RESPONSE: Respondent lacks the requisite experience in this area so as to provide an adequate response to this interrogatory.

INTERROGATORY NO. 83: Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

RESPONSE: Respondent lacks the requisite experience in this area so as to provide an adequate response to this interrogatory.

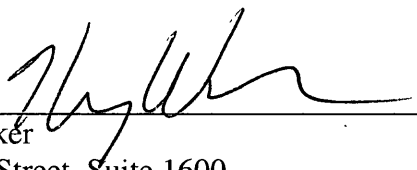
INTERROGATORY NO. 84: What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the TRA should consider in establishing a “cutoff” consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: Unknown.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

Authorized Representative for IDS Telcom, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

Guy Hicks
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201

Charles B. Welch, Esquire
Farris, Mathews, et. Al
618 Church St., #300
Nashville, TN 37219

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave., N. #320
Nashville, TN 37219-1823

James Wright, Esquire
United Telephone – Southeast
14111 Capital Blvd.
Wake Forest, NC 27587

Martha M. Ross-Bain, Esq.
AT&T Communications of the
South Central States, LLC
1200 Peachtree Street, Suite 8100
Atlanta, GA 30309


Ms. Carol Kuhnow
Qwest Communications, Inc.
4250 N. Fairfax Dr.
Arlington, VA 33303

Jon E. Hastings, Esq.
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Dale Grimes, Esq.
Bass, Berry & Sims
315 Deaderick St., #2700
Nashville, TN 37238-3001

Mark W. Smith, Esq.
Strang, Fletcher, et al.
One Union Square, #400
Chattanooga, TN 37402

Nanette S. Edwards, Esq.
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802



Henry Walker